

JAMES P. KEMP, ESQ.  
Nevada Bar No.: 6375  
VICTORIA L. NEAL, ESQ.  
Nevada Bar No.: 13382  
KEMP & KEMP  
7435 W. Azure Drive, Suite 110  
Las Vegas, NV 89130  
702-258-1183 ph /702-258-6983 fax  
jp@kemp-attorneys.com  
vneal@kemp-attorneys.com

Attorneys for Plaintiff  
*Shamika Locklin*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

\*\*\*

SHAMIKA LOCKLIN,

Plaintiff,

vs.

MANDALAY BAY, LLC, a domestic limited  
liability company, d/b/a MANDALAY BAY  
RESORT AND CASINO; DOES I-X; and  
ROE.

Defendants.

Case No.: 2:21-cv-0230-JAD-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF TO  
RESPOND TO DEFENDANT'S  
MOTION TO DISMISS AT ECF NO. 26**

**[First Request]**

ECF No. 27

IT IS HEREBY STIPULATED by and between the parties, through their respective counsel, that Plaintiff shall have, subject to the Court's approval, a two-week extension, up to and including May 7, 2021, to respond to Defendant's Motion to Dismiss filed April 9, 2021 at ECF No. 26. This is the first stipulation for an extension of time to extend Plaintiff's deadline to respond. This stipulation is made in good faith and not for purposes of improper delay.

1 This request is made because Plaintiff's counsel is experiencing a heavy case load including  
2 in the week Defendant's Motion was filed, and in the weeks immediately following, a reply to a  
3 Motion to Remove Confidential Designations, preparing two Early Neutral Evaluation Statements,  
4 client preparation and attendance at those ENE's, preparing two settlement briefs, client preparation  
5 and attendance of those settlement conferences, preparing discovery responses and initial  
6 disclosures, two hearings, two preconference meetings with the court, a JAMS mediation, two all-  
7 day depositions, and a 9th Circuit mediation.

9 For the above reasons so that Plaintiff can fully address the issues in Defendant's Motion to  
10 Dismiss, the parties believe a two-week extension, up to and including May 7, 2021, is appropriate.

12 DATED this 19<sup>th</sup> day of April 2021.

14 KEMP & KEMP

15 /s/ Victoria L. Neal  
Victoria L. Neal, Esq.  
16 Nevada Bar No.: 13382  
7435 W. Azure Drive, Ste. 110  
17 Las Vegas, NV 89130

18 Attorney for Plaintiff  
19 Shamika Locklin

DATED this 19<sup>th</sup> day of April 2021.


MGM RESORTS INTERNATIONAL

15 /s/ Kelly Kichline  
Kelly Kichline, Esq.  
16 Nevada Bar No.: 10642  
6385 S. Rainbow Blvd., Suite 500  
17 Las Vegas, NV 89118

18 Attorney for Defendant  
19 Mandalay Bay, LLC

21 **ORDER**

23 IT IS SO ORDERED:

24   
25 U.S. District Judge Jennifer A. Dorsey  
26 Dated: May 4, 2021  
27  
28